

EXHIBIT 1

From: Gilmore, Jamison
Sent: Thursday, July 24, 2025 9:27 PM
To: Murphy, Michael D.
Cc: Follett, Matthew; Schiraldi, Michael V.; Nwasike, Jessica; Arjam, Farshid; Malynn, Todd M.; Beral, Arash
Subject: RE: SPAVI v. PCJV - Incomplete Production of Trial Exhibits

Mr. Murphy,

Your accusations are incorrect. There is no need to point fingers—please stay civil. The facts are simple:

1. Our second set of trial documents are due in approximately 24 hours.
2. You have still not fulfilled your obligation and promise to provide exhibits, including exhibits promised again approximately 8 hours ago, and 10 or so new exhibits not disclosed in discovery and promised approximately 6 hours ago.
3. You have still not fulfilled your obligation and promise to provide an amended exhibit list.

You have several team members CC'ed here and an army of litigators at Fox Rothschild. Please utilize your resources to fulfill your obligations immediately to prevent further prejudice to our clients.

Thank you,

Jamison T. Gilmore | BLANKROME

2029 Century Park East | 6th Floor | Los Angeles, CA 90067
+1 (424) 239-3843 | jamison.gilmore@blankrome.com

From: Murphy, Michael D. <mdmurphy@foxrothschild.com>
Sent: Thursday, July 24, 2025 8:47 PM
To: Gilmore, Jamison <Jamison.Gilmore@blankrome.com>
Cc: Follett, Matthew <MFollett@foxrothschild.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Nwasike, Jessica <jnwasike@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Beral, Arash <arash.beral@blankrome.com>
Subject: RE: SPAVI v. PCJV - Incomplete Production of Trial Exhibits

Jamison:

This is false. You asked me to guess how many new exhibits and I said maybe 10 but I said do not hold me to it. This is why I have asked to record our meet and confers because you misrepresent what I say.

Tonight I have to review 500 trial exhibits dropped on me for the first time by you today. You did not comply with your obligations

I am also revising your jury instructions filled with bad law because you would not go through them with me on zoom

I have also agreed to figure out what the gap is all about and fix it in our exhibits.


You on the other hand appear to just be emailing every thirty minutes to essentially mock us for your having sandbagged us today.


Have a good night.



Michael Murphy

Partner

 (213) 213-1211

 (310) 974-2271 (cell)

 mdmurphy@foxrothschild.com

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From: Gilmore, Jamison <Jamison.Gilmore@blankrome.com>

Sent: Thursday, July 24, 2025 8:37 PM

To: Murphy, Michael D. <mdmurphy@foxrothschild.com>

Cc: Follett, Matthew <MFollett@foxrothschild.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Nwasike, Jessica <jnwasike@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Beral, Arash <arash.beral@blankrome.com>

Subject: [EXT] Re: SPAVI v. PCJV - Incomplete Production of Trial Exhibits

Mr. Murphy,

At 3pm today you promised you would give your amended exhibit list with approximately 10 additional exhibits shortly after the call. That takes 5 minutes to revise—not 5 hours. Please send it immediately.

You agreed to exchange exhibits at 1pm. You failed to do so. Please send the missing exhibits that you promised to exchange immediately.

Your decision to review our exhibits (after having weeks to prepare objections to basically all but the 2025 financials, as to which you have not raised a substantive objection) is not an excuse to fulfill your obligations as required by court order. As you know, we were ready to exchange exhibits weeks ago, but you repeatedly decided to delay.

You are continuously prejudging our clients. Please stop.

On Jul 24, 2025, at 8:14 PM, Murphy, Michael D. <mdmurphy@foxrothschild.com> wrote:

I am going to find out what happened and fill in an gaps when we get you our revised exhibit list which you agreed we could prepare and add some exhibits left our last time, seeing as how you did the same thing.

You will have answers in a few hours.


And please stop trying to build a record. The reason I didn't see your emails is because I was going through 500+ of you exhibits, delivered to us today, for the first time, as part of a totally new exhibit list I received from you yesterday that contains many exhibits you never previously identified.


You sandbagged us over the last two days.



Michael Murphy

Partner

 (213) 213-1211

 (310) 974-2271 (cell)

 mdmurphy@foxrothschild.com

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From: Gilmore, Jamison <Jamison.Gilmore@blankrome.com>

Sent: Thursday, July 24, 2025 7:51 PM

To: Murphy, Michael D. <mdmurphy@foxrothschild.com>; Follett, Matthew

<MFollett@foxrothschild.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Nwasike, Jessica

<jnwasike@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>

Cc: Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Beral, Arash <arash.beral@blankrome.com>

Subject: [EXT] Re: SPAVI v. PCJV - Incomplete Production of Trial Exhibits

Following up a third time. Please stop prejudicing our clients.

On Jul 24, 2025, at 6:39 PM, Gilmore, Jamison

<Jamison.Gilmore@blankrome.com> wrote:

Following up a second time.

On Jul 24, 2025, at 5:41 PM, Gilmore, Jamison

<Jamison.Gilmore@blankrome.com> wrote:

Following up.

On Jul 24, 2025, at 4:20 PM, Gilmore, Jamison

<Jamison.Gilmore@blankrome.com> wrote:

Mr. Murphy and team,

The exhibits you provided are numbered Exh. Nos. 1-72, 98, 106, 108, 111, 113-114, 116-117. Missing from your production are Exh. Nos. 73-97, 99-105, 107, 109-110, 112, 115, and 118. Accordingly:

1. Please confirm that you are intentionally omitting the missing exhibits.
2. If you are not intentionally omitting the missing exhibits, please provide them immediately.

Thank you,

Jamison T. Gilmore | BLANKROME

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90067

+1 (424) 239-3843 | jamison.gilmore@blankrome.com

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